

## **STATEMENT OF B.G. FREIGHT LINE HOLDING B.V. AS PARENT COMPANY FOR THE B.G. FREIGHT LINE GROUP OF COMPANIES (“B.G. FREIGHT LINE”) PURSUANT TO THE UK MODERN SLAVERY ACT 2015 (“THE ACT”)**

At B.G. Freight Line we are committed to doing the right thing in the right way. Our policies and procedures aim to ensure that the highest standards of ethics and integrity are maintained. As the shipping line division of the Peel Ports Group of companies (“Peel Ports Group”), we recognise that we have a responsibility to take a robust approach to slavery and human trafficking and we are fully committed to combatting slavery and human trafficking.

### **ORGANISATION STRUCTURE & BUSINESS**

B.G. Freight Line is the shipping line division of Peel Ports Group. We are based in the Netherlands and provide short sea container services between the UK, Ireland and mainland Europe and feeder services between the UK and Ireland.

### **OUR SUPPLY CHAIN**

Our supply chain principally covers the time charter of vessels (which includes the provision of crew), haulage, supply of fuel and waste disposal services. In addition, we lease containers and utilise third party hauliers.

### **OUR POLICIES ON SLAVERY AND HUMAN TRAFFICKING**

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chain or in any part of our business. Our anti-slavery and human trafficking policy reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chain.

### **SUPPLIER ADHERENCE TO OUR VALUES AND ETHICS**

We have zero tolerance to slavery and human trafficking and expect those in our supply chain and contractors to comply with our values and ethics. To that end we are in the process of putting in place a supply chain compliance programme to consist of certifications where

available and contractual provisions requiring compliance including sanctions for supplier non-compliance.

## **DUE DILIGENCE PROCESSES**

As part of our initiative to identify and mitigate risk we are seeking to implement the following steps:

### **Supply Chain**

#### **Supplier Selection, Certifications and Contracts**

- We endeavour to remain using only reputable shipbrokers and ship owners when chartering vessels and only use reputable terminals and hauliers to load/unload our transported cargo;
- We are progressing with putting in place procedures to ensure that future suppliers of goods or services to B.G. Freight Line are required to respond to a pass/fail question on whether their organisation is compliant with the Act in the UK and acknowledge the supplier adheres to the same principles in the area's where the Act is not legally enforceable when contracts are struck or renewed.;
- We are enriching our agreements at contract renewal dates which are used for the purchase and supply of goods and services to include obligations requiring compliance with all applicable laws, statutes, regulations, codes and policies, including in relation to anti-slavery and anti-human trafficking, and requiring that adequate and compliant policies and procedures are maintained and enforced related to such matters and prohibiting any activities, practices or conduct which may constitute or cause any breach of, or offence under, any such laws, statutes, regulations, codes, policies or procedures. They will also provide for us to terminate and cease dealing with any supplier in the event of a breach of any such obligations;

## **Violations**

In accordance with our zero tolerance policy towards violations of the laws banning forced labour, slavery and human trafficking, we will seek to ensure that all future agreements, which are used for the purchase and supply of goods and services will allow us to terminate and cease dealing with any supplier in the event of any such violation.

## **Our own business**

### **Written policies and procedures**

#### **Code of Conduct**

The Peel Ports Group Code of Conduct applies to B.G. Freight Line and details the standards that all our employees are expected to adhere to in terms of behaviour.

In March 2019, the Group adopted a new Code of Conduct and rolled out desk top training to all employees in relation to the Code. The Code of Conduct details the standards that all Peel Ports' employees are expected to adhere to in terms of behaviour. The Code sets out Peel Port's undertaking with regard to human rights and compliance with labour law. It contains a specific section on Modern Slavery, which details Peel Ports' responsibilities and Supply Chain Compliance Programme. It states Peel Ports' commitment to not use compulsory or forced labour in its operations and to maintain a framework of fair and just remuneration and working hours.

#### **Whistleblowing policy**

B.G. Freight Line encourages all its workers, customers and business partners to report any concerns related to its direct activities or its supply chain. This includes any circumstances that give rise to an enhanced risk of slavery or human trafficking. Peel Ports Group's Whistleblowing policy is applicable to employees of B.G. Freight Line and is designed to make it easy for employees or officers to make disclosures without fear of retaliation. Knowledge of which is updated in the 2018/19 version of the B.G. employee handbook.

### **Recruitment /Agency Workers Policy**

B.G. Freight Line is reviewed its recruitment procedures during 2018 (both direct and through employment agencies) to ensure that we have in place correct identity checks prior to employing individuals and have ensured that all our employees are in receipt of at least the applicable minimum wage.

## **Training**

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chain and our business, we are in the process of introducing workshop training for relevant managers within our business.

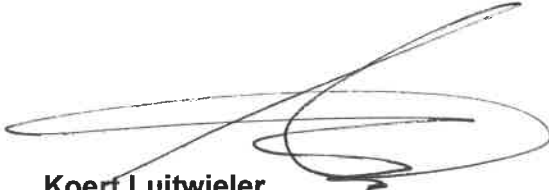
## **Violations**

Our Disciplinary policy permits the termination of employment of employees found to be involved in any breach of the law including the law banning forced labour, slavery and human trafficking.

## **OUR EFFECTIVENESS IN COMBATTING SLAVERY AND HUMAN TRAFFICKING**

We will keep under review, monitor and assess how effective we are to ensure that slavery and human trafficking is not taking place in any part of our business or supply chain and we will take and implement all appropriate steps and measures to act on the findings and outcomes of any such reviews and assessments and maximise our effectiveness and continual improvement.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes B.G. Freight Line's slavery and human trafficking statement for the financial year ended 31 March 2019. The statement has been approved by our Board of Directors.



**Koert Luitwieler**

**Director**

**B.G. Freight Line Holding B.V.**

30 September 2019